

8:24CV225  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

JESS T. LAMMERS

V

County of Phelps NE  
Phelps County Corrections  
• Admin Penny Gregg

2024 JUN 17 AM 11:25

① Violation of Policy  
PCC Hand book② Violations of Nebraska  
Minimum jail Standards

Comes Now JESS T. LAMMERS, in person pro se, sues with complaint that Phelps Co Corrections (PCC), County of Phelps, NE, and Penny Gregg have violated their own hand book / Policy Manual and subsequently have violated Nebraska's Minimum jail Standards.

JUN 17 2024

PCC, County of Phelps NE, and Penny Gregg have waived qualified immunity by purchase of risk management insurance (see PTSCA ~~§ 81NRS 13-910 & 13-916~~) Brendy Johnson & Jeff Lunkemeyer represent NIRMA for County of Phelps. Gregg is sued in personal and professional capacity.

Citing Stone v Murray, Topchan v Morganthau and PLATSKI v City, the pleading shall be heard in proper legal framework, interpreted liberally to in most favorable legal light for plaintiff and if defective court shall issue ~~re~~ remonstrance and p#

JUN 17 2024

CLERK  
U.S. DISTRICT COURT

allow Repleading

— FACTS —

- ① Lammers was admitted to PCC May 12 2024
- ② Lammers is disabled pursuant to ADT.
- ③ Social Security deemed Lammers 100% disabled May 2 2020 because of abuse suffered in PCC.
- ④ Lammers was in PCC April 30 2020 to May 6 2020 - Disability is the direct result of PCC negligence

— 2024

- ⑤ Pursuant to jail standard 00.2.41 Lammers is segregated
- ⑥ Pursuant to Page 9 and 10 of PCC manual Lammers is offered "Rec" but not "Passive Rec".
- ⑦ Lammers has never been cleared by HCP for rec pursuant to PCC manual
- ⑧ In violation of min. jail Standard (web) ch 003.01 Lammers has been segregated and kept in cell 24 hrs a day 7 days a week.
- ⑨ ~~is violation~~ violation of ch 003.05 of minimum jail standards. PCC has no mention of "Passive Rec" in its manual nor has Lammers been offered "Passive Rec"
- ⑩ Phelps County and PCC are in violation of minimum jail standards

PFC 2

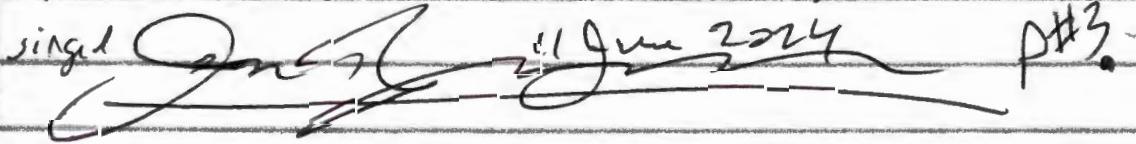
⑪ The administrative Penny Gregg is charged with teaching staff, writing PCC manual, and developing programs in line with Min. jail Standards. Penny Gregg has failed to meet Min Jail Standards. PCC has failed to meet or exceed minimum jail standards and has failed to meet ADA (Americans with disability act) standards.

### Prayer for Relief

- ① Termination of Penny Gregg as Jail Admin.
- ② PCC's ICF contract cancelled
- ③ 5 million dollars in damages Payed to LAMMERS or LAMMERS state if PCC should happen to kill LAMMERS.

### Court of Service

LAMMERS sent this complaint to USDC of NE 111 S 18 Plaza Ste 1152 Omaha NE and LAMMERS sent a copy to Sally Fox Clerk of ~~P~~ County of Phelps PO Box 404 Holdrege NE 68949 - NATALIE NELSEN Phelps Co. attorney waived 6 month waiting period per PSTCA 13-901 to 13-926

signed  11 June 2024 p#3.

## IN THE DISTRICT COURT OF PHELPS COUNTY, NEBRASKA

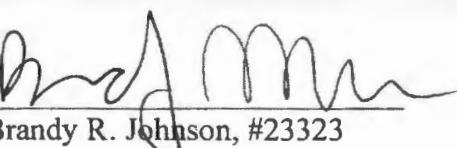
JESS T. LAMMERS, ) CASE NO. CI 20-113  
                         )  
                         )  
     Plaintiff,         )  
                         )  
     vs.                 ) ENTRY OF APPEARANCE OF  
                         )  
     COUNTY OF PHELPS, STATE OF     ) BRANDY R. JOHNSON  
     NEBRASKA, et al.,         ) AS COUNSEL FOR DEFENDANT  
                         )  
     Defendants.         )

COMES NOW, Brandy R. Johnson, and enters her appearance as counsel on behalf of the Defendant, County of Phelps, Nebraska, and asks that her name and contact information be entered of record as follows:

Brandy R. Johnson, #23323  
 Governmental Law, LLC  
 8040 Eiger Drive  
 Suite B  
 Lincoln, NE 68516  
 (402) 742-9240  
 (402) 742-9250 (fax)  
brandy@nrmainc.info

THE COUNTY OF PHELPS, NEBRASKA,  
 Defendant.

BY:



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*Counsel for Defendant County*

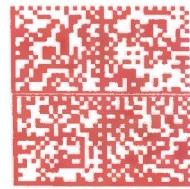
LAMMERS  
PCC  
715 8th Ave ste 20  
Holdrege NE 68949

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U.S. DISTRICT COURT

OMAHA NE 680

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USDC of NE Attn Clerk  
111 S. 18 Plaza Ste 1152  
Omaha NE 68902-1322

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was mailed by an inmate  
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Jail. Its contents are uncensored.**